

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

*Plaintiffs,*

v.

THE STATE OF TEXAS, et al.,

*Defendants.*

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Civil Action No: Consolidated Case  
5:21-cv-00844-XR

**MOTION FOR ADMISSION *PRO HAC VICE***

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now **Caroline A. Lebel**, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas pro hac vice to represent **Defendant Lisa Wise, in her official capacity as the El Paso County Elections Commissioner** in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm **Cooley LLP**, with offices at;  
  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: +1 415 693-2000  
Facsimile: +1 415 693-2222  
Email: clebel@cooley.com
2. Since **November 23, 2021**, Applicant has been and presently is a member of and in good standing with the Bar of the State of **California**.

Applicant's bar license number is **340067**.

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3. Applicant has been admitted to practice before the following courts:

Court:	Admission Date:
Ninth Circuit Court of Appeals	12/22/2021
U.S. District Court, Northern District of CA	12/22/2021
U.S. District Court, Central District of CA	12/22/2021

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. I **have not** previously applied to Appear Pro Hac Vice in this district in Cases [s]:

N/A

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided below:

N/A

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

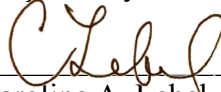
9. Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Orion Armon (oarmon@cooley.com)  
Cooley LLP  
1144 15<sup>th</sup> Street  
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Denver, CO 80202-2686  
Telephone: +1 720 566-4000  
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Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of **Caroline A. Lebel** to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

  
\_\_\_\_\_  
Caroline A. Lebel

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 20<sup>th</sup> day of May, 2022.

  
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Orion Armon (CO SBN #34923)